



**BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA**

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Order Instituting Rulemaking to Implement the
Commission's Procurement Incentive Framework and to
Examine the Integration of Greenhouse Gas Emissions
Standards into Procurement Policies

Rulemaking 06-04-009
(Filed April 13, 2007)

REPLY COMMENTS OF SEMPRA GLOBAL ON PROPOSED INTERIM OPINION

Theodore E. Roberts

Attorney for Sempra Global
101 Ash Street, HQ 12B
San Diego, CA 92101-3017
Telephone: (619) 699-5111
Facsimile: (619) 699-5027
E-mail: troberts@sempra.com

August 30, 2007

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I. INTRODUCTION

In accordance with Rules 14.3 and 14.6 of the Commission's Rules of Practice and Procedure, Sempra Global herewith files its reply comments on the Proposed Interim Opinion of Reporting and Tracking of Greenhouse Gas Emissions in the Electricity Sector (the "PD") that was publicly released on August 15, 2007. In its opening comments, Sempra Global commented on only a single issue, namely, the discussion in Section V.B.2.(a), which states that:

[I]n our opinion it is unlikely that new contracts with existing generation sources would produce real reductions in GHG emissions, since most, if not all, of existing power plants would run the same regardless of any new contract. Therefore, we recommend that ARB attribute emissions for purchases from specified sources based on emissions of the specified resource only if (a) the purchase is made through a PPA that was in effect prior to January 1, 2008 and either is still in effect or has been renewed without interruption, or (b) the purchase is made through a PPA from a power plant that became operational on or after January 1, 2008. PD, at p. 21.

Sempra Global's comments emphasized that this proposed "fix" for alleged problems related to contract shuffling was not supported by the record, was speculative, suffered from potential legal defects, and did not promote the goals of the Legislature or of the Commission in implementing AB 32.

Sempra Global notes with satisfaction that there was nearly unanimous agreement among the commenting parties that this proposed recommendation should not be adopted. Many of the arguments were similar to those of Sempra Global, and the Alliance for Retail Energy Markets (“AReM”) in particular added thoughtful comments of the potential impact of this proposed recommendation on California’s retail energy markets and load-serving entities. In fact, the only party that supported the proposed recommendation was the Commission’s Division of Ratepayer Advocates (“DRA”). In addition, the joint comments of the Environmental Defense /Natural Resources Defense Council/ Union of Concerned Scientists (“ED/NRDC/UCS”), while not specifically addressing this issue, did express support for the achievement of “real reductions,” which was one premise upon which the proposed recommendation was based.

Sempra Global will address the comments of these two parties in its reply. Sempra Global believes that these parties’ explicit or implicit support of the proposed recommendation is misplaced because it is based on the creation of false emissions data with respect to the existing units. Sempra Global believes that a paramount requirement for a successful program is the use of accurate and “real” emissions to the fullest extent possible. This fundamental requirement is undermined by the proposed recommendation, and is at odds with other principles supported by DRA and ED/NRDC/UCS.

II. REPLY COMMENTS

DRA states at page 2 that it supports the idea of the Air Resources Board making adjustments to the emissions reported by load-serving entities in order to minimize contract shuffling and achieve “real reductions.” DRA cites the proposed recommendation on contracts with existing resources as one recommendation of which it approves. However, in the next

section of its comments, discussing emissions from resources used as firming power to support renewable generation DRA states that:

For reporting purposes under AB 32, accuracy is critical, and ignoring the actual emissions factor, and hence emissions, of firming power would undermine this accuracy. Ignoring this distinction in the purposes of the two statutes amounts to a factual error that the Commission should correct in the final decision by requiring firming resources to be assigned their actual emissions value. DRA comments, at p. 3.

Sempra Global wholeheartedly with the DRA agrees that accuracy is critical, and that the Commission should not undermine that accuracy. This same reasoning supports Sempra Global's position that the Commission should recommend use of the actual emissions of existing resources in reporting, and find other means of dealing with contract shuffling if the need arises. In that respect, Sempra Global also agrees with Pacific Gas and Electric ("PG&E"), who stated:

[N]othing in section 38530(a) allows the reporting rules to be used to change the actual emissions to a fictional quantity of emissions that has no basis in fact, merely to solve a perceived regulatory problem. PG&E comments, at p. 7.

As to ED/NRDC/UCS, while committed to the idea of achieving "real reductions" in emissions, they also devote several paragraphs of their comments to the notion that the adopted recommendations should provide incentives for load-serving entities to enter into contracts with low- and zero- emitting resources, a proposition that Sempra Global supports. As such, Sempra Global believes that this proposition is severely undermined by the proposed recommendation which, as discussed by AReM, would penalize load-serving entities who wish to contract with low-emitting existing resources.

The Commission should pay heed to the overwhelming opposition to its proposed recommendation, and eliminate it from the final decision.

III. CONCLUSION

As discussed in Sempra Global's opening comments and echoed by the comments of nearly every other party, the proposed recommendation to require load-serving entities to report the emissions associated with new contracts with existing resources is deeply flawed and should not be adopted. In order to achieve real reductions and to ensure that the program is credible, emissions must be accurately tracked and reported to the maximum feasible extent. The proposed recommendation undermines such accuracy. Even the two parties that expressed explicit or implicit support for the proposed recommendation take other positions in conflict with such support. For these reasons, it should not be adopted.

Respectfully submitted,

/s/ THEODORE E. ROBERTS
Theodore E. Roberts

Attorney for Sempra Global
101 Ash Street, HQ 12B
San Diego, CA 92101-3017
Telephone: (619) 699-5111
Facsimile: (619) 699-5027
E-mail: troborts@sempra.com

August 30, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of the foregoing **REPLY**
COMMENTS OF SEMPRA GLOBAL ON PROPOSED INTERIM OPINION on all parties
identified in R.06-04-009 on the attached service list by U.S. mail and electronic mail, and by
Federal Express to the assigned Commissioner(s) and Administrative Law Judge(s).

Dated at San Diego, California, this 30th day of August, 2007.

/s/ JOEL DELLOSA
Joel Dellosa

CALIFORNIA PUBLIC UTILITIES COMMISSION

Service Lists

**Proceeding: R0604009 - CPUC - PG&E, SDG&E,
Filer: CPUC - PG&E, SDG&E, SOCALGAS, EDISON
List Name: LIST
Last changed: August 29, 2007**

cadams@covantaenergy.com	CINDY	ADAMS
steven.schleimer@barclayscapital.com	STEVEN S.	SCHLEIMER
steven.huhman@morganstanley.com	STEVEN	HUHMAN
rick_noger@praxair.com	RICK C.	NOGER
keith.mccrea@sablaw.com	KEITH R.	MCCREA
ajkatz@mwe.com	ADAM J.	KATZ
ckrupka@mwe.com	CATHERINE M.	KRUPKA
lisa.decker@constellation.com	LISA M.	DECKER
cswoollums@midamerican.com	CATHY S.	WOOLLUMS
kevin.boudreaux@calpine.com	KEVIN	BOUDREAU
trdill@westernhubs.com	THOMAS	DILL
ej_wright@oxy.com	E.J.	WRIGHT
pseby@mckennalong.com	PAUL M.	SEBY
todil@mckennalong.com	TIMOTHY R.	ODIL
steve.koerner@elpaso.com	STEPHEN G.	KOERNER, ESQ.
jenine.schenk@apses.com	JENINE	SCHENK
jbw@slwplc.com	JOHN B.	WELDON, JR.
kelly.barr@srpnet.com	KELLY	BARR
rrtaylor@srpnet.com	ROBERT R.	TAYLOR
smichel@westernresources.org	STEVEN S.	MICHEL
roger.montgomery@swgas.com	ROGER C.	MONTGOMERY
ron.deaton@ladwp.com	RONALD F.	DEATON
snewsom@semprautilities.com	SID	NEWSOME
dhuard@manatt.com	DAVID L.	HUARD
curtis.kebler@google.com	CURTIS L.	KEBLER
dehling@klng.com	DENNIS M.P.	EHLING
gregory.koiser@constellation.com	GREGORY	KOISER
npedersen@hanmor.com	NORMAN A.	PEDERSEN
mmazur@3phasesRenewables.com	MICHAEL	MAZUR
tiffany.rau@bp.com	TIFFANY	RAU
klatt@energyattorney.com	GREGORY	KLATT
maureen@lennonassociates.com	MAUREEN	LENNON
rhelgeson@scppa.org	RICHARD	HELGESON
douglass@energyattorney.com	DANIEL W.	DOUGLASS
pssed@adelphia.net	PAUL	DELANEY
akbar.jazayeri@sce.com	AKBAR	JAZAYERI
annette.gilliam@sce.com	ANNETTE	GILLIAM
cathy.karlstad@sce.com	CATHY A.	KARLSTAD
Laura.Genao@sce.com	LAURA I.	GENAO
rkmoore@gswater.com	RONALD	MOORE

dwood8@cox.net	DON	WOOD
amsmith@sempra.com	AIMEE M.	SMITH
atrial@sempra.com	ALLEN K.	TRIAL
apak@sempraglobal	ALVIN	PAK
dhecht@sempratrading.com	DAN	HECHT
daking@sempra.com	DANIEL A.	KING
svongdeuane@semprasolutions.com	SYMONE	VONGDEUANE
troberts@sempra.com	THEODORE	ROBERTS
liddell@energyattorney.com	DONALD C.	LIDDELL, P.C.
marcie.milner@shell.com	MARCIE	MILNER
rwinthrop@pilotpowergroup.com	REID A.	WINTHROP
tdarton@pilotpowergroup.com	THOMAS	DARTON
lschavrien@semprauilities.com	STEVE	RAHON
GloriaB@anzaelectric.org	GLORIA	BRITTON
llund@commerceenergy.com	LYNELLE	LUND
thunt@cecmail.org	TAMLYN M.	HUNT
jeanne.sole@sfgov.org	JEANNE M.	SOLE
john.hughes@sce.com	JOHN P.	HUGHES
llorenz@semprauilities.com	LAD	LORENZ
marcel@turn.org	MARCEL	HAWIGER
nsuetake@turn.org	NINA	SUETAKE
dil@cpuc.ca.gov	Diana L.	Lee
fjs@cpuc.ca.gov	F. Jackson	Stoddard
achang@nrdc.org	AUDREY	CHANG
rsa@a-klaw.com	DONALD	BROOKHYSER
ek@a-klaw.com	EVELYN	KAHL
kgrenfell@nrdc.org	KRISTIN	GRENFELL
mpa@a-klaw.com	MICHAEL P.	ALCANTAR
sls@a-klaw.com	SEEMA	SRINIVASAN
bill.chen@constellation.com	WILLIAM H.	CHEN
bkc7@pge.com	BRIAN K.	CHERRY
epoole@adplaw.com	EDWARD G	POOLE
agrimaldi@mckennalong.com	ANN G.	GRIMALDI
bcragg@goodinmacbride.com	BRIAN T.	CРАGG
jsqueri@gmssr.com	JAMES D.	SQUERI
jarmstrong@goodinmacbride.com	JEANNE B.	ARMSTRONG
kbowen@winston.com	KAREN	BOWEN
lcottle@winston.com	LISA A.	COTTLE
sbeatty@cwclaw.com	SEAN P.	BEATTY
vprabhakaran@goodinmacbride.com	VIDHYA	PRABHAKARAN
jkarp@winston.com	JOSEPH M.	KARP
jeffgray@dwt.com	JEFFREY P.	GRAY
cjw5@pge.com	CHRISTOPHER J.	WARNER
ssmyers@att.net	SARA STECK	MYERS
lars@resource-solutions.org	LARS	KVALE
alho@pge.com	ANDREW L.	HARRIS
aweller@sel.com	ANDREA	WELLER
jchamberlin@strategicenergy.com	JENNIFER	CHAMBERLIN
beth@beth411.com	BETH	VAUGHAN
kerry.hattevik@mirant.com	KERRY	HATTEVIK

kowalewskia@calpine.com	AVIS	KOWALEWSKI
wbooth@booth-law.com	WILLIAM H.	BOOTH
hoerner@redefiningprogress.org	J. ANDREW	HOERNER
janill.richards@doj.ca.gov	JANILL	RICHARDS
cchen@ucsusa.org	CLIFF	CHEN
gmorris@emf.net	GREGG	MORRIS
tomb@crossborderenergy.com	R. THOMAS	BEACH
bmcc@mccarthylaw.com	BARRY F.	MCCARTHY
sberlin@mccarthylaw.com	C. SUSIE	BERLIN
anginc@goldrush.com	MIKE	LAMOND
joyw@mid.org	JOY A.	WARREN
	BALDASSARO	DI CAPO
jjensen@kirkwood.com	JOHN	JENSEN
mary.lynch@constellation.com	MARY	LYNCH
lrdevanna-rf@cleanenergysystems.com	LEONARD	DEVANNA
abb@eslawfirm.com	ANDREW	BROWN
mclaughlin@braunlegal.com	BRUCE	MCLAUGHLIN
glw@eslawfirm.com	GREGGORY L.	WHEATLAND
jluckhardt@downeybrand.com	JANE E.	LUCKHARDT
jdh@eslawfirm.com	JEFFERY D.	HARRIS
vwelch@environmentaldefense.org	VIRGIL	WELCH
www@eslawfirm.com	WILLIAM W.	WESTERFIELD, 111
	DOWNEY	BRAND
westgas@aol.com	RAYMOND J.	CZAHAR, C.P.A.
scohn@smud.org	STEVEN M.	COHN
atrowbridge@daycartermurphy.com	ANN L.	TROWBRIDGE
dansvec@hdo.net	DAN	SILVERIA
notice@psrec.coop	JESSICA	NELSON
deb@a-klaw.com	DONALD	BROOKHYSER
cynthia.schultz@pacificorp.com	CYNTHIA	SCHULTZ
kyle.l.davis@pacificorp.com	KYLE L.	DAVIS
ryan.flynn@pacificorp.com	RYAN	FLYNN
carter@ieta.org	IAN	CARTER
jason.dubchak@niskags.com	JASON	DUBCHAK
bjones@mjbradley.com	BRIAN M.	JONES
	MATTHEW	MOST
kcolburn@symbioticstrategies.com	KENNETH A.	COLBURN
rapcowart@aol.com	RICHARD	COWART
Kathryn.Wig@nrgenergy.com	KATHRYN	WIG
sasteriadis@apx.com	SAKIS	ASTERIADIS
george.hopley@barcap.com	GEORGE	HOPLEY
ez@pointcarbon.com	ELIZABETH	ZELLJADT
burtraw@rff.org	DALLAS	BURTRAW
vb@pointcarbon.com	VERONIQUE	BUGNION
kyle_boudreaux@fpl.com	KYLE D.	BOUDREAUX
andrew.bradford@constellation.com	ANDREW	BRADFORD
gbarch@knowledgeinenergy.com	GARY	BARCH
ralph.dennis@constellation.com	RALPH E.	DENNIS
smindel@knowledgeinenergy.com	SAMARA	MINDEL
brabe@umich.edu	BARRY	RABE

bpotts@foley.com	BRIAN	POTTS
james.keating@bp.com	JAMES W.	KEATING
jimross@r-c-s-inc.com	JAMES	ROSS
tcarlson@reliant.com	TRENT A.	CARLSON
ghinners@reliant.com	GARY	HINNERS
zaiontj@bp.com	JEANNE	ZAIONTZ
julie.martin@bp.com	JULIE L.	MARTIN
fiji.george@elpaso.com	FIJI	GEORGE
echiang@elementmarkets.com	ED	CHIANG
nenbar@energy-insights.com	NADAV	ENBAR
nlenssen@energy-insights.com	NICHOLAS	LENSSEN
bbaker@summitblue.com	ELIZABETH	BAKER
william.tomlinson@elpaso.com	WAYNE	TOMLINSON
kjsimonsen@ems-ca.com	KEVIN J.	SIMONSEN
plusk@wecc.biz	PHILIP D.	LUSK
Sandra.ely@state.nm.us	SANDRA	ELY
bmcquown@reliant.com	BRIAN	MCQUOWN
dbrooks@nevlp.com	DOUGLAS	BROOKS
anita.hart@swgas.com	ANITA	HART
randy.sable@swgas.com	RANDY	SABLE
bill.schrand@swgas.com	BILL	SCHRAND
jj.prucnal@swgas.com	JJ	PRUCNAL
meridith.strand@swgas.com	MERIDITH J.	STRAND
ckmitchell1@sbcglobal.net	CYNTHIA	MITCHELL
chilen@sppc.com	CHRISTOPHER A.	HILEN
emello@sppc.com	ELENA	MELLO
tdillard@sierrapacific.com	TREVOR	DILLARD
dsoyars@sppc.com	DARRELL	SOYARS
fluchetti@ndep.nv.gov	FRANK	LUCHETTI
leilani.johnson@ladwp.com	LEILANI	JOHNSON KOWAL
Lorraine.Paskett@ladwp.com	LORRAINE	PASKETT
randy.howard@ladwp.com	RANDY S.	HOWARD
robert.pettinato@ladwp.com	ROBERT L.	PETTINATO
hyao@semprautilities.com	HUGH	YAO
rprince@semprautilities.com	RASHA	PRINCE
rkeen@manatt.com	RANDALL W.	KEEN
nwhang@manatt.com	S. NANCY	WHANG
pjazayeri@stroock.com	PETER	JAZAYERI
derek@climateregistry.org	DEREK	MARKOLF
david@nemtzow.com	DAVID	NEMTZOW
harveyederpspc.org@hotmail.com	HARVEY	EDER
vitaly.lee@aes.com	VITALY	LEE
sendo@ci.pasadena.ca.us	STEVE	ENDO
slins@ci.glendale.ca.us	STEVEN G.	LINS
THAMILTON5@CHARTER.NET	TOM	HAMILTON
bjeider@ci.burbank.ca.us	BRUNO	JEIDER
rmorillo@ci.burbank.ca.us	RICHARD J.	MORILLO
roger.pelete@williams.com	ROGER	PELOTE
aimee.brances@ecosecurities.com	AIMEE	BARNES
case.admin@sce.com	CASE	ADMINISTRATION

tim.hemig@nrgenergy.com	TIM	HEMIG
bjl@bry.com	BARRY	LOVELL
aldyn.hoekstra@paceglobal.com	ALDYN	HOEKSTRA
ygross@sempraglobal.com	YVONNE	GROSS
jlaun@apogee.net	JOHN	LAUN
kmkiener@fox.net	KIM	KIENER
scottanders@sandiego.edu	SCOTT J.	ANDERS
jkloberdanz@semprautilities.com	JOSEPH R.	KLOBERDANZ
andrew.mcallister@energycenter.org	ANDREW	MCALLISTER
jack.burke@energycenter.org	JACK	BURKE
jennifer.porter@energycenter.org	JENNIFER	PORTER
sephra.ninow@energycenter.org	SEPHRA A.	NINOW
jleslie@luce.com	JOHN W.	LESLIE
ofoote@hkcf-law.com	ORLANDO B.	FOOTE, III
ekgrubaugh@iid.com	ELSTON K.	GRUBAUGH
pepper@cleanpowermarkets.com	THOMAS	MCCABE
gsmith@adamsbroadwell.com	JAN	PEPPER
mdjoseph@adamsbroadwell.com	GLORIA D.	SMITH
diane_fellman@fpl.com	MARC D.	JOSEPH
hayley@turn.org	DIANE I.	FELLMAN
mflorio@turn.org	HAYLEY	GOODSON
Dan.adler@calcef.org	MICHEL	FLORIO
mhyams@sfwater.org	DAN	ADLER
tburke@sfwater.org	MICHAEL A.	HYAMS
norman.furuta@navy.mil	THERESA	BURKE
amber@ethree.com	NORMAN J.	FURUTA
annabelle.malins@fco.gov.uk	AMBER	MAHONE
dwang@nrdc.org	ANNABELLE	MALINS
filings@a-klaw.com	DEVRA	WANG
nes@a-klaw.com	KAREN	TERRANOVA
obystrom@cera.com	NORA	SHERIFF
sdhilton@stoel.com	OLOF	BYSTROM
scarter@nrdc.org	SETH	HILTON
abonds@thelen.com	SHERYL	CARTER
cbaskette@enernoc.com	ASHLEE M.	BONDS
colin.petheram@att.com	CARMEN E.	BASKETTE
jwmctarnaghan@duanemorris.com	COLIN	PETHERAM
kfox@wsgr.com	JAMES W.	TARNAGHAN
kkhoja@thelenreid.com	KEVIN	FOX
pvallen@thelen.com	KHURSHID	KHOJA
spauker@wsgr.com	PETER V.	ALLEN
rreinhard@mofo.com	SHERIDAN J.	PAUKER
cem@newsdata.com	ROBERT J.	REINHARD
hgolub@nixonpeabody.com	HOWARD V.	GOLUB
jscancarelli@flk.com	JANINE L.	SCANCARELLI
jwiedman@goodinmacbride.com	JOSEPH F.	WIEDMAN
mmattes@nossaman.com	MARTIN A.	MATTES
jen@cnt.org	JEN	MCGRAW
lisa_weinzimer@platts.com	LISA	WEINZIMER

steven@moss.net	STEVEN	MOSS
sellis@fypower.org	SHAUN	ELLIS
arno@recurrentenergy.com	ARNO	HARRIS
ELL5@pge.com	ED	LUCHA
gxl2@pge.com	GRACE	LIVINGSTON-NUNLEY
jxa2@pge.com	JASMIN	ANSAR
JDF1@PGE.COM	JONATHAN	FORRESTER
sscb@pge.com	SEBASTIEN	CSAPO
svs6@pge.com	SOUMYA	SASTRY
S1L7@pge.com	STEPHANIE	LA SHAWN
vjw3@pge.com	VALERIE J.	WINN
karla.dailey@cityofpaloalto.org	KARLA	DAILEY
farrokh.albuyeh@oati.net	FARROKH	ALBUYEH
dtibbs@aes4u.com	DEAN R.	TIBBS
jhahn@covantaenergy.com	JEFFREY L.	HAHN
andy.vanhorn@vhcenergy.com	ANDREW J.	VAN HORN
info@calseia.org	SUE	KATELEY
greg.blue@sbcglobal.net	GREG	BLUE
Joe.paul@dynegy.com	JOSEPH M.	PAUL
monica.schwebs@bingham.com	MONICA A.	SCHWEBs, ESQ.
phanschen@mofo.com	PETER W.	HANSCHEN
josephhenri@hotmail.com	JOSEPH	HENRI
pthompson@summitblue.com	PATRICIA	THOMPSON
dietrichlaw2@earthlink.net	WILLIAM F.	DIETRICH
Betty.Seto@kema.com	BETTY	SETO
JerryL@abag.ca.gov	GERALD L.	LAHR
jody_london_consulting@earthlink.net	JODY S.	LONDON
steve@schiller.com	STEVEN	SCHILLER
mrw@mrwassoc.com		
rschmidt@bartlewells.com	REED V.	SCHMIDT
adamb@greenlining.org	ADAM	BRIONES
clyde.murley@comcast.net	CLYDE	MURLEY
brenda.lemay@horizonwind.com	BRENDA	LEMAY
carla.peterman@gmail.com	CARLA	PETERMAN
elvine@lbl.gov	EDWARD	VINE
rhwiser@lbl.gov	RYAN	WISER
C_Marnay@1b1.gov	CHRIS	MARNAY
philm@scdenergy.com	PHILLIP J.	MULLER
rita@ritanortonconsulting.com	RITA	NORTON
cpechman@powereconomics.com	CARL	PECHMAN
emahlon@ecoact.org	MAHLON	ALDRIDGE
richards@mid.org	RICHARD	SMITH
chrism@mid.org	CHRISTOPHER J.	MAYER
rogerv@mid.org	ROGER	VAN HOY
fwmonier@tid.org	WES	MONIER
brbarkovich@earthlink.net	BARBARA R.	BARKOVICH
johnrredding@earthlink.net	JOHN R.	REDDING
clark.bernier@rlw.com	CLARK	BERNIER
rmccann@umich.edu	RICHARD	MCCANN, PH.D
cmkehrein@ems-ca.com	CAROLYN M.	KEHREIN

e-recipient@caiso.com		
grosenblum@caiso.com	GRANT	ROSENBLUM, ESQ.
	KAREN	EDSON
rsmutny-jones@caiso.com	ROBIN	SMUTNY-JONES
saeed.farrokhpay@ferc.gov	SAEED	FARROKHPAY
david@branchcomb.com	DAVID	BRANCHCOMB
kenneth.swain@navigantconsulting.com	KENNY	SWAIN
kduse1@navigantconsulting.com	KIRBY	DUSEL
gpickering@navigantconsulting.com	GORDON	PICKERING
lpark@navigantconsulting.com	LAURIE	PARK
davidreynolds@ncpa.com	DAVID	REYNOLDS
scott.tomashefsky@ncpa.com	SCOTT	TOMASHEFSKY
ewolfe@resero.com	ELLEN	WOLFE
Audra.Hartmann@Dynegy.com	AUDRA	HARTMANN
Bob.lucas@calobby.com	BOB	LUCAS
curt.barry@iwpnews.com	CURT	BARRY
dave@ppallc.com	DAVID L.	MODISSETTE
wynne@braunlegal.com	JUSTIN C.	WYNNE
kellie.smith@sen.ca.gov	KELLIE	SMITH
mwaugh@arb.ca.gov	MICHAEL	WAUGH
pstoner@lgc.org	PATRICK	STONER
rachel@ceert.org	RACHEL	MCMAHON
wtasat@arb.ca.gov	WEBSTER	TASAT
steven@iepa.com	STEVEN	KELLY
etiedemann@kmtg.com	EDWARD J.	TIEDEMANN
bushinskyj@pewclimate.org	JOSHUA	BUSHINSKY
lmh@eslawfirm.com	LYNN	HAUG
obartho@smud.org	OBADIAH	BARTHOLOMY
bbeebe@smud.org	BUD	BEEBE
bpurewal@water.ca.gov	BALWANT S.	PUREWAL
dmacmll@water.ca.gov	DOUGLAS	MACMULLLEN
kmills@cfbf.com	KAREN NORENE	MILLS
karen@klindh.com	KAREN	LINDH
ehadley@reupower.com	ELIZABETH W.	HADLEY
Denise_Hill@transalta.com	DENISE	HILL
sas@a-klaw.com	ANNIE	STANGE
egw@a-klaw.com	ELIZABETH	WESTBY
akelly@climatetrust.org	ALEXIA C.	KELLY
alan.comnes@nrgenergy.com	ALAN	COMNES
kyle.silon@ecosecurities.com	KYLE	SILON
californiadockets@pacificorp.com	CATHIE	ALLEN
Philip.H.Carver@state.or.us	PHIL	CARVER
samuel.r.sadler@state.or.us	SAM	SADLER
lisa.c.schwartz@state.or.us	LISA	SCHWARTZ
cbreidenich@yahoo.com	CLARE	BREIDENICH
dws@r-c-s-inc.com	DONALD	SCHOENBECK
jesus.arredondo@nrgenergy.com	JESUS	ARREDONDO
charlie.blair@delta-ee.com	CHARLIE	BLAIR
karen.mcdonald@powerex.com	KAREN	MCDONALD
loe@cpuc.ca.gov	James	Loewen

clarence.binninger@doj.ca.gov	CLARENCE	BINNINGER
david.zonana@doj.ca.gov	DAVID	ZONANA
agc@cpuc.ca.gov	Andrew	Campbell
aeg@cpuc.ca.gov	Anne	Gillette
blm@cpuc.ca.gov	Beth	Moore
cft@cpuc.ca.gov	Charlotte	TerKeurst
tam@cpuc.ca.gov	Christine S.	Tam
dsh@cpuc.ca.gov	Donald R.	Smith
edm@cpuc.ca.gov	Ed	Moldavsky
cpe@cpuc.ca.gov	Eugene	Cadenasso
hym@cpuc.ca.gov	Harvey Y.	Morris
hs1@cpuc.ca.gov	Henry	Stern
jm3@cpuc.ca.gov	Jaclyn	Marks
jnm@cpuc.ca.gov	Jacqueline	Greig
jbf@cpuc.ca.gov	Jamie	Fordyce
jk1@cpuc.ca.gov	Jason R.	Salmi Klotz
jst@cpuc.ca.gov	Jeorge S.	Tagnipes
jtp@cpuc.ca.gov	Joel T.	Perlstein
jol@cpuc.ca.gov	Jonathan	Lakritz
jci@cpuc.ca.gov	Judith	Ikle
jf2@cpuc.ca.gov	Julie A.	Fitch
krd@cpuc.ca.gov	Kristin	Ralff Douglas
lrm@cpuc.ca.gov	Lainie	Motamedi
ltt@cpuc.ca.gov	Lana	Tran
mjd@cpuc.ca.gov	Matthew	Deal
meg@cpuc.ca.gov	Meg	Gottstein
ner@cpuc.ca.gov	Nancy	Ryan
pw1@cpuc.ca.gov	Pamela	Wellner
psp@cpuc.ca.gov	Paul S.	Phillips
pzs@cpuc.ca.gov	Pearlie	Sabino
rmm@cpuc.ca.gov	Rahmon	Momoh
ram@cpuc.ca.gov	Richard A.	Myers
smk@cpuc.ca.gov	Sara M.	Kamins
sgm@cpuc.ca.gov	Scott	Murtishaw
svn@cpuc.ca.gov	Sean A.	Simon
scr@cpuc.ca.gov	Steve	Roscow
tcx@cpuc.ca.gov	Theresa	Cho
ken.alex@doj.ca.gov	BILL	LOCKYER
ken.alex@doj.ca.gov	KEN	ALEX
bdicapo@caiso.com	BALDASSARO	DICAPO
jsanders@caiso.com	JUDITH B.	SANDERS
jgill@caiso.com	JULIE	GILL
	MARY	MCDONALD
ppettingill@caiso.com	PHILIP D.	PETTINGILL
mscheibl@arb.ca.gov	MICHAEL	SCHEIBLE
gottstein@volcano.net	MEG	GOTTSTEIN
pburmich@arb.ca.gov	PAM	BURMICH
bblevins@energy.state.ca.us	B. B.	BLEVINS
dmetz@energy.state.ca.us	DARYL	METZ
deborah.sl0n@doj.ca.gov	DEBORAH	SLON

dkscpuc.ca.gov	Don	Schultz
kgriffin@energy.state.ca.us	KAREN	GRIFFIN
ldecarlo@energy.state.ca.us	LISA	DECARLO
mpryor@energy.state.ca.us	MARC	PRYOR
mgarcia@arb.ca.gov	MICHELLE	GARCIA
pduvair@energy.state.ca.us	PIERRE H.	DUVAIR
wsm@cpuc.ca.gov	Wade	McCartney
hurlock@water.ca.gov	CAROL J.	HURLOCK
hcronin@water.ca.gov	HOLLY B.	CRONIN